

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ST. PAUL FIRE AND MARINE INSURANCE  
COMPANY

\*

Civil Action No.: WDQ-02CV3123

\*

Plaintiff,

\*

v.

\*

TRANSAMERICA OCCIDENTAL LIFE  
INSURANCE COMPANY, et al.,

\*

Defendants.

\* \* \* \* \*

**DISCLOSURE OF AFFILIATIONS AND FINANCIAL INTEREST**

Pursuant to Rule 103.3 of the Local Rules of the United States District Court for the District of Maryland, the undersigned attorneys of record for Defendants AMERICAN UNITED LIFE INSURANCE COMPANY, FIRST ALLMERICA FINANCIAL LIFE INSURANCE COMPANY, CONNECTICUT GENERAL LIFE INSURANCE COMPANY, COMBINED INSURANCE COMPANY OF AMERICA, CROWN LIFE INSURANCE COMPANY, THE EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES, MANUFACTURERS LIFE INSURANCE COMPANY, PHOENIX LIFE INSURANCE COMPANY, SUN LIFE ASSURANCE COMPANY OF CANADA, SWISS RE LIFE & HEALTH AMERICA, INC., SWISS RE AMERICA HOLDING CORPORATION, UNUM LIFE INSURANCE COMPANY OF AMERICA, GENERAL & COLOGNE LIFE RE OF AMERICA, and CANADA LIFE INSURANCE COMPANY OF AMERICA ("Defendants"), discloses that the following are corporate parents, subsidiaries or

affiliates of Defendants.

Defendant American United Life Insurance Company:

American United Mutual Insurance Holding Co.  
OneAmerican Financial Partners, Inc.  
CNL Financial Corporation  
Cherokee National Life Insurance Company  
CNL/Insurance America Inc.  
Pioneer Mutual Life Insurance Company  
Pioneer Mutual Financial Services, Inc.  
American United Life Re S.A.  
OneAmerica Securities Inc.  
OAS Insurance Agency  
AUL Equity Sales Agency, Inc.  
Commodore National Reinsurance Co., LTD  
CNL Resource Marketing Corp.  
CNL Technology Group, Inc.  
The State Life Insurance Co.  
AUL Reinsurance Management Services, LLC  
AUL Reinsurance Management Services (Bermuda) Ltd.

Defendant First Allmerica Financial Life Insurance Company:

AAM Equity Fund  
AAM High Yield Fund, LLC  
Advantage Insurance Network, Inc.  
AFC Capital Trust I  
Allmerica Asset Management, Limited  
Allmerica Benefits Inc.  
Allmerica Equity Index Pool  
Allmerica Financial Alliance Insurance Company  
Allmerica Financial Benefit Insurance Company  
Allmerica Financial Corporation  
Allmerica Financial Insurance Brokers, Inc.  
Allmerica Financial Investment Management Services, Inc.  
Allmerica Financial Life Insurance and Annuity Company  
Allmerica Financial Services Insurance Agency, Inc.  
Allmerica Funding Corp.  
Allmerica Investments Insurance Agency Inc. of Alabama  
Allmerica Investments Insurance Agency of Florida, Inc.  
Allmerica Investments Insurance Agency Inc. of Georgia  
Allmerica Investments Insurance Agency Inc. of Kentucky  
Allmerica Investments Insurance Agency Inc. of Mississippi  
Allmerica Investment Trust

Allmerica Plus Insurance Agency, Inc.  
Allmerica Securities Trust  
Allmerica Trust Company, N.A.  
AMGRO, Inc.  
AMGRO Receivables Corporation  
Citizens Insurance Company of America  
Citizens Insurance Company of Illinois  
Citizens Insurance Company of Ohio  
Citizens Insurance Company of the Midwest  
Citizens Management Inc.  
Financial Profiles, Inc.  
First Sterling Limited  
First Sterling Reinsurance Company Limited  
Greendale Special Placements Fund  
The Hanover American Insurance Company  
The Hanover Insurance Company  
Hanover Lloyd's Insurance Company  
Hanover Texas Insurance Management Company, Inc.  
Lloyds Credit Corporation  
Massachusetts Bay Insurance Company  
Opus Investment Management, Inc.  
VeraVest, Inc.  
VeraVest Investments, Inc.  
VeraVest Investment Advisors, Inc.

Defendant Connecticut General Life Insurance Company:  
See attached Exhibit A.

Defendant General & Cologne Life Re of America:  
Askarben Life Insurance Company  
Berkshire Hathaway Incorporated  
Berkshire Hathaway International Insurance Limited  
Berkshire Hathaway Life Insurance Company of Nebraska  
BH Columbia Incorporated  
BHG Life Insurance Company  
Blue Chip Stamps  
Brookwood Insurance Company  
Central States of Omaha Companies  
Central States Indemnity Co. of Omaha  
Cologne Holding Company of America  
Cologne Reinsurance Co. (Dublin) Limited  
Columbia Insurance Company  
Continental Divide Insurance Company

Cornhusker Casualty Company  
Cypress Insurance Company (CA)  
Europa Rueckversicherung Aktiengesellschaft  
Fairfield Insurance Company  
Faraday Reinsurance Co. Limited  
GEICO Casualty Company  
GEICO Corporation  
GEICO General Insurance Company  
GEICO Indemnity Company  
General & Cologne Life Re (Barbados) Ltd.  
The General & Cologne Re Africa Limited  
General & Cologne Re (Bermuda)  
General & Cologne Re Brasil Ltda.  
General & Cologne Re Cia Re  
General & Cologne Re (Sur) Compania de Reaseguros S.A.  
General & Cologne Re Iberica Correadors & Reaseguros  
General & Cologne Reinsurance (Barbados) Ltd.  
General & Cologne Scandinavia A/S  
Gen Re Holdings Incorporated  
General Re (Bermuda) Ltd  
General Re Cia de Reaseguros S.A.  
General Re - CKAG Reinsurance & Investments SARL  
General Reinsurance Corporation  
General Star Indemnity Company  
General Star International Indemnity Ltd.  
General Star National Insurance Company  
GeneralCologne Life Re Australia Limited  
GeneralCologne Life Re UK Limited  
GeneralCologne Re Australia Limited  
GeneralCologne Re Mexico, S.A.  
GeneralCologne Re Ruckverssicherungs AG Wien  
GeneralCologne Re UK Ltd  
Genesis Indemnity Insurance Company  
Genesis Insurance Company  
Government Employees Insurance Company  
GRD Corporation  
IdeaLife Insurance Company  
Kansas Bankers Surety Company  
Koelnische Rueckversicherung Gesellschaft AG  
Mount Vernon Fire Insurance Company  
National Fire and Marine Insurance Company  
National Indemnity Company  
National Indemnity Company of Mid-America

National Indemnity Company of the South  
National Liability Company and Fire Insurance Company  
National Re Corporation  
National Reinsurance Corporation  
North Star Reinsurance Corporation  
Oak River Insurance Company  
OBH Incorporated  
Redwood Fire and Casualty Insurance Company  
Reinsurance Underwriting Services Ltd.  
Republic Insurance Company  
U.S. Underwriters Insurance Company  
Unione Italiana Reinsurance Company of America, Inc.  
United States Liability Insurance Company  
U S Investment Corporation  
Wesco Financial Corporation  
Wesco Holdings Midwest Incorporated  
Wesco-Financial Insurance Company

Defendant Combined Insurance Company of America:

Aon Corporation  
CICA Superannuation Nominees Pty Ltd  
CICA SPE, LLC  
Combined Insurance Company of New Zealand Limited  
Combined Life Insurance Company of New York  
Combined Seguros Mexico, S.A. de C.V.  
Employee Benefit Communications, Inc.  
Highplain Limited  
Resource Life Insurance Company  
Sterling Life Insurance Company  
Superannuation Fund (CICNZ) Limited  
VOL Properties Corporation  
123 Newco. Inc.

Defendant The Equitable Life Assurance Society of the United States:

AXA Financial Inc.  
AXA Group of France  
Alliance Capital Management, L.P.

Defendant Manufacturers Life Insurance Company:

The Manufacturers Investment Corporation  
The Manufacturers Life Insurance Company of New York  
The Manufacturers Life Insurance Company (U.S.A.)  
MFC Global Investment Management (U.S.A.) Limited

Defendant Phoenix Life Insurance Company:

See attached Exhibit B.

Defendant Sun Life Assurance Company of Canada:

Sun Life Financial Services of Canada, Inc.

Sun Life of Canada (U.S.) Holdings, Inc.

Sun Life Assurance Company of Canada - U.S. Operations Holdings, Inc.

Sun Life Insurance and Annuity Company of New York

Keyport Life Insurance Company

Keyport Benefit Life Insurance Company

Independence Life & Annuity Company

Clarica Life Reinsurance Company

Clarica Reinsurance Holdings

Clarica US Inc.

Defendant Swiss Re Life & Health America, Inc.:

Airco Receivables Purchase I, LLC

Allied Life Financial Corporation

Allied Life Brokerage Agency, Inc.

Atlantic International Reinsurance Company Ltd.

BGFRTS, L.C.

CDMB Reinsurance Company Ltd.

The Center Insurance Services, Inc.

The Center Marine Managers, Inc.

Cincinnati Real Properties, Incorporated

Conning Corporation

Conning Inc.

Conning & Company

Conning Asset Management Company

Conning Research & Consulting, Inc.

Employers Direct Insurance Company

Employers Direct Corporation

European Reinsurance Company of Zurich

European International Holding Company Ltd.

European International Reinsurance Company Ltd.

Facility Insurance Holding Corporation

Facility Insurance Corporation

Fort Wayne Health & Casualty Insurance Company

Fort Wayne Intermediaries, Inc.

Fort Wayne Management Services, Inc.

Fort Wayne Structured Settlement, Inc.

Fort Wayne Underwriting Services, Ltd.

Fox-Pitt, Kelton Group Limited

Fox-Pitt, Kelton Corporation  
Fox-Pitt, Kelton Inc.  
FW (China) Inc.  
Gerling NCM Credit and Finance AG  
Gerling NCM Credit Insurance, Inc.  
GSSW, Limited Partnership  
GSSW-REO Ownership Corporation  
I.C.H. Funding Corp.  
International Collections, Inc.  
KB Management, L.L.C.  
Life Re Capital Trust I  
Life Re Capital Trust II  
Life Re International, Ltd.  
Lincoln National Reassurance Company  
Lincoln National Risk Management, Inc.  
Lincoln Re, SA  
Linsco Reinsurance Company  
LSL Financial Corporation  
Marketing One Financial Corporation  
Mission Life Corporation  
Mission Life Insurance Company of America  
MRECO Incorporated  
NAS Management Inc.  
NCM Holding NV  
Nederlandsche Credietverzekering Maatschappij NV  
North American Capacity Insurance Company  
North American Elite Insurance Company  
North American Specialty Insurance Company  
Old Fort Insurance Company, Ltd.  
Pacific Life and Accident Insurance Company  
PartnerRe Ltd.  
PartnerRe Holdings SA  
PartnerRe SA  
PartnerRe U.S. Corporation  
Partner Reinsurance Company of the U.S.  
PartnerRe Asset Management Corporation  
PartnerRe Insurance Company of New York  
PartnerRe New Solutions Inc.  
PartnerRe Finance I Inc.  
PartnerRe Finance II Inc.  
PartnerRe Capital Trust I  
PartnerRe Capital Trust II  
PartnerRe Capital Trust III

Penn La Franco Corporation  
Pro US LLC  
Quail Creek Recreation, Inc.  
REALIC of Jacksonville Plans, Inc.  
Reassure America Life Insurance Company  
Reassure America Life Insurance Company (Canadian Branch)  
Rio Bravo Investimentos, Ltda.  
ROP Financial Group Inc.  
ROP Inc.  
Saddlecreek Enterprises, L.L.C.  
Servicios de Evaluacion de Riesgos  
Securitas Capital (UK) Limited  
Securitas Capital, LLC  
Securitas Latin America Management Co., Ltd.  
Securitas EDC, LP  
Securitas EDC, Ltd.  
Solutions Reinsurance Limited  
Special Pooled Risk Administrators  
Southwestern Financial Services Corporation  
Southwestern Life Holdings Inc.  
Southwestern Life Insurance Company  
SRCP (Bermuda) Ltd.  
SRCP Holding, Inc.  
SRCP-SH, LLC  
Stockwood Reinsurance Company Ltd.  
SWFC Nevada Inc.  
Swiss-Am Reassurance Company  
Swiss Re America Holding Corporation  
Swiss Re Asset Management (Americas) Inc.  
Swiss Re Asset Management (Canada) Ltd.  
Swiss Re Atrium Corporation  
Swiss Re Capitol Management (Bermuda) Ltd.  
Swiss Re Capitol Markets Corporation  
Swiss Re Capitol Markets (Japan) Corporation  
Swiss Re Capitol Partners (US) Inc.  
Swiss Re Financial Products Corporation  
Swiss Re Financial Services Corporation  
Swiss Re GB Ltd.  
Swiss Re Holdings (Canada) Inc.  
Swiss Re Life & Health America Holding Company  
Swiss Re Life & Health Canada  
Swiss Re Management Corporation  
Swiss Re Partnership Holding, LLC



Swiss Re Underwriters Agency Inc.  
Swiss Re Underwriters Representatives Ltd.  
Swiss Reinsurance America Corporation  
Swiss Reinsurance Company  
Swiss Reinsurance Company (Canadian Branch)  
Swiss Reinsurance Company Canada  
SW Houston Hotel, Ltd.  
SWL Marketing Services, Inc.  
SWL Preneed Services, Inc.  
Transat Madison Corporation  
Underwriters Re Group Inc.  
Underwriters Reinsurance Company  
URC International Inc.  
URC Management Inc.  
Washington International Insurance Company

Defendant Swiss Re America Holding Corporation:

Airco Receivables Purchase I, LLC  
Allied Life Financial Corporation  
Allied Life Brokerage Agency, Inc.  
Atlantic International Reinsurance Company Ltd.  
BGFRTS, L.C.  
CDMB Reinsurance Company Ltd.  
The Center Insurance Services, Inc.  
The Center Marine Managers, Inc.  
Cincinnati Real Properties, Incorporated  
Conning Corporation  
Conning Inc.  
Conning & Company  
Conning Asset Management Company  
Conning Research & Consulting, Inc.  
Employers Direct Insurance Company  
Employers Direct Corporation  
European Reinsurance Company of Zurich  
European International Holding Company Ltd.  
European International Reinsurance Company Ltd.  
Facility Insurance Holding Corporation  
Facility Insurance Corporation  
Fort Wayne Health & Casualty Insurance Company  
Fort Wayne Intermediaries, Inc.  
Fort Wayne Management Services, Inc.  
Fort Wayne Structured Settlement, Inc.  
Fort Wayne Underwriting Services, Ltd.

Fox-Pitt, Kelton Group Limited  
Fox-Pitt, Kelton Corporation  
Fox-Pitt, Kelton Inc.  
FW (China) Inc.  
Gerling NCM Credit and Finance AG  
Gerling NCM Credit Insurance, Inc.  
GSSW, Limited Partnership  
GSSW-REO Ownership Corporation  
I.C.H. Funding Corp.  
International Collections, Inc.  
KB Management, L.L.C.  
Life Re Capital Trust I  
Life Re Capital Trust II  
Life Re International, Ltd.  
Lincoln National Reassurance Company  
Lincoln National Risk Management, Inc.  
Lincoln Re, SA  
Linsco Reinsurance Company  
LSL Financial Corporation  
Marketing One Financial Corporation  
Mission Life Corporation  
Mission Life Insurance Company of America  
MRECO Incorporated  
NAS Management Inc.  
NCM Holding NV  
Nederlandsche Credietverzekering Maatschappij NV  
North American Capacity Insurance Company  
North American Elite Insurance Company  
North American Specialty Insurance Company  
Old Fort Insurance Company, Ltd.  
Pacific Life and Accident Insurance Company  
PartnerRe Ltd.  
PartnerRe Holdings SA  
PartnerRe SA  
PartnerRe U.S. Corporation  
Partner Reinsurance Company of the U.S.  
PartnerRe Asset Management Corporation  
PartnerRe Insurance Company of New York  
PartnerRe New Solutions Inc.  
PartnerRe Finance I Inc.  
PartnerRe Finance II Inc.  
PartnerRe Capital Trust I  
PartnerRe Capital Trust II

PartnerRe Capital Trust III  
Penn La Franco Corporation  
Pro US LLC  
Quail Creek Recreation, Inc.  
REALIC of Jacksonville Plans, Inc.  
Reassure America Life Insurance Company  
Reassure America Life Insurance Company (Canadian Branch)  
Rio Bravo Invetimentos, Ltda.  
ROP Financial Group Inc.  
ROP Inc.  
Saddlecreek Enterprises, L.L.C.  
Servicios de Evaluacion de Riesgos  
Securitas Capital (UK) Limited  
Securitas Capital, LLC  
Securitas Latin America Management Co., Ltd.  
Securitas EDC, LP  
Securitas EDC, Ltd.  
Solutions Reinsurance Limited  
Special Pooled Risk Administrators  
Southwestern Financial Services Corporation  
Southwestern Life Holdings Inc.  
Southwestern Life Insurance Company  
SRCP (Bermuda) Ltd.  
SRCP Holding, Inc.  
SRCP-SH, LLC  
Stockwood Reinsurance Company Ltd.  
SWFC Nevada Inc.  
Swiss-Am Reassurance Company  
Swiss Re Asset Management (Americas) Inc.  
Swiss Re Asset Management (Canada) Ltd.  
Swiss Re Atrium Corporation  
Swiss Re Capitol Management (Bermuda) Ltd.  
Swiss Re Capitol Markets Corporation  
Swiss Re Capitol Markets (Japan) Corporation  
Swiss Re Capitol Partners (US) Inc.  
Swiss Re Financial Products Corporation  
Swiss Re Financial Services Corporation  
Swiss Re GB Ltd.  
Swiss Re Holdings (Canada) Inc.  
Swiss Re Life & Health America, Inc.  
Swiss Re Life & Health America Holding Company  
Swiss Re Life & Health Canada  
Swiss Re Management Corporation

Swiss Re Partnership Holding, LLC  
Swiss Re Underwriters Agency Inc.  
Swiss Re Underwriters Representatives Ltd.  
Swiss Reinsurance America Corporation  
Swiss Reinsurance Company  
Swiss Reinsurance Company (Canadian Branch)  
Swiss Reinsurance Company Canada  
SW Houston Hotel, Ltd.  
SWL Marketing Services, Inc.  
SWL Preneed Services, Inc.  
Transat Madison Corporation  
Underwriters Re Group Inc.  
Underwriters Reinsurance Company  
URC International Inc.  
URC Management Inc.  
Washington International Insurance Company

Defendant Unum Life Insurance Company of America:

UnumProvident Corporation  
BenefitAmerica, Inc.  
Benefit Technologies Inc.  
Boston Compania Argentina de Seguros S.A.  
Boston Seguros de Vida S.A.  
Claim Service International, Inc.  
Claim Services International Limited  
Colonial Companies Inc.  
Colonial Life & Accident Insurance Company  
Duncanson & Holt Asia PTE Ltd.  
Duncanson & Holt Agencies Limited  
Duncanson & Holt, Canada, Ltd.  
Duncanson & Holt, Europe Ltd.  
Duncanson & Holt, Inc.  
Duncanson & Holt Services, Inc.  
Duncanson & Holt Syndicate Management Ltd.  
Duncanson & Holt Underwriters Ltd.  
Fibos, S.A.  
First Unum Life Insurance Company  
Genex Consultants Inc.  
GENEX Services Inc.  
GENEX Services of Canada Inc.  
Genex Services Inc. of Ohio  
LRG Services Limited  
Options & Choices, Inc.

The Paul Revere Corporation  
The Paul Revere Life Insurance Company  
The Paul Revere Variable Annuity Insurance Company  
Primecor Inc.  
Provident Insurance Agency LLC  
Provident Investment Management LLC  
Provident Life and Accident Insurance Company  
Provident Life and Casualty Insurance Company  
SP Administrator LLC  
Trafalgar Underwriting Agencies Ltd.  
TRI-CAN Reinsurance, Inc.  
UNUM Development Corporation  
UNUM European Holding Company Limited  
UNUM International Underwriters Inc.  
UNUM Japan Accident Insurance Company Limited  
UNUM Holding Company  
UNUM Limited  
UNUMProvident International Ltd.

Defendant Canada Life Insurance Company of America:

The Canada Life Assurance Company  
Canada Life Capitol Corporation  
Canada Life Corporation  
Canada Life Insurance Company of New York  
Canada Life Insurance Company of Puerto Rico, Inc.  
Canada Life International Holding  
Canada Life International Re Limited

In addition, the undersigned attorneys of record for the above named defendants state upon information and belief that the following entities may have a financial interest in the outcome of this litigation by virtue of their agreements to provide indemnity with respect to the supersedeas bond securing the judgment from which this action arises:

Security Life Insurance Company of America  
Security American Financial Enterprises, Inc.  
Allianz Life Insurance Company of North America

SEMMES, BOWEN & SEMMES, P.C.

/s/ J. Snowden Stanley, Jr.

J. Snowden Stanley, Jr., Fed. Bar #00059  
SEMMES, BOWEN & SEMMES, P.C.  
250 West Pratt Street  
Baltimore, MD 21201  
(410) 539-5040

- and -

MOUND, COTTON, WOLLAN & GREENGRASS  
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New York, NY 10004  
(212) 804-4200

**ATTORNEYS FOR DEFENDANTS**

AMERICAN UNITED LIFE INSURANCE COMPANY,  
FIRST ALLMERICA FINANCIAL LIFE INSURANCE  
COMPANY, CONNECTICUT GENERAL LIFE  
INSURANCE COMPANY, COMBINED INSURANCE  
COMPANY OF AMERICA, CROWN LIFE INSURANCE  
COMPANY, THE EQUITABLE LIFE ASSURANCE  
SOCIETY OF THE UNITED STATES, MANUFACTURERS  
LIFE INSURANCE COMPANY, PHOENIX LIFE  
INSURANCE COMPANY, SUN LIFE  
ASSURANCE COMPANY OF CANADA, SWISS RE  
LIFE & HEALTH AMERICA, INC., SWISS RE AMERICA  
HOLDING CORPORATION, UNUM LIFE  
INSURANCE COMPANY OF AMERICA, GENERAL &  
COLOGNE LIFE RE OF AMERICA, and CANADA LIFE  
INSURANCE COMPANY OF AMERICA

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 27<sup>th</sup> day of March, 2003, a copies of Defendants' Disclosure of Affiliations and Financial Interest were served, electronically or by first class mail (pursuant to the Local Rules and rules governing electronic filing) to the following:

Paul F. Strain, Esq.  
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and Marine Insurance Co.*

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Baltimore, MD 21202  
*Counsel for Defendant  
Transamerica Occidental Life Insurance Co.*

The Mercantile and General Reinsurance  
Company, Limited  
Walter B. Kielholz, Chairman  
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Armonk, NY 10504  
*Defendant*

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Cologne Life Reinsurance Company  
Thomas M. West, CEO  
695 East Main Street  
Stamford, CT 06901  
*Defendant*

/s/ J. Snowden Stanley, Jr.  
J. Snowden Stanley, Jr.

(B0331671.WPD;1)